IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN THE MATTER OF:)	IN BANKRUPTCY
JULIO C. & BLANCA A. URIOSTEGUI,)	No. 17-35119
Debtor(s).)	

NOTICE

TO: OFFICE OF THE U.S. TRUSTEE - Service through CM/ECF David M. Siegel, Attorney for Debtor - Service through CM/ECF Julio C. & Blanca A. Uriostegui, 185 Knightsbridge Drive, Mundelein, IL 60060 -Service by First Class U. S. Mail

PLEASE TAKE NOTICE that on the 9th day of March, 2018 at the hour of 1:00 p.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable **A. BENJAMIN GOLDGAR**, Bankruptcy Judge, North Branch Court, 1792 Nicole Lane, Round Lake Beach, IL 60073 and then and there present the attached Application To Extend Time To File Objections To Exemptions, at which time and place you may appear, if you so see fit.

/s/ Joseph E. Cohen JOSEPH E. COHEN 105 W. Madison Street, Suite 1100 Chicago, Illinois 60602 312/368-0300

STATE OF ILLINOIS) SS COUNTY OF C O O K)

JOSEPH E. COHEN, being first duly sworn on oath, deposes and states that he served a copy of the foregoing Notice together with a copy of the Application attached hereto on the parties shown above, by electronic service or by First Class U. S. Mail this 28nd day of February, 2018.

/s/ Joseph E. Cohen

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Debtor(s).)	

<u>APPLICATION TO EXTEND TIME TO FILE OBJECTIONS TO EXEMPTIONS</u>

TO THE HONORABLE A. BENJAMIN GOLDGAR, BANKRUPTCY JUDGE

Now comes JOSEPH E. COHEN, Trustee herein, and respectfully represents unto this Honorable Court as follows:

- 1. That he is the duly appointed and acting Trustee in Bankruptcy herein.
- 2. That the initial Section 341 meeting was held on January 11, 2018.
- 3. That on January 30, 2018 the Debtors filed an Amended Schedule A, B, & C.
- 4. That there are undisclosed assets owned by the Debtors that have now been claimed exempt on the Amended Schedule C.
 - 5. That Rule 4003(b) states as follows:
 - (b) Objecting to a Claim of Exemptions.
 - (1) Except as provided in paragraphs (2) and (3), a party in interest may file an objection to the list of property claimed as exempt within 30 days after the meeting of creditors held under §341(a) is concluded or within 30 days after any amendment to the list or supplemental schedules is filed, whichever is later. The court may, for cause, extend the time for filing objections if, before the time to object expires, a party in interest files a request for an extension.
- 6. That the time for the Trustee and other parties to object to the Debtors exemptions would expire on March 2, 2018 pursuant to Rule 4003(b).
 - 7. That the Trustee believes that the Debtor has erroneously claimed certain

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assets exempt on his Schedule C.

8. The Trustee needs an additional period of time until April 23, 2018 to draft and file various Objections to Exemption claimed by the Debtor.

WHEREFORE, **JOSEPH E. COHEN**, Trustee herein, prays for the entry of an Order extending the time for the Trustee to file any objections to exemptions to and through April 23, 2018 and for such other and further relief as the Court shall deem proper.

JOSEPH E. COHEN GINA B. KROL COHEN & KROL 105 West Madison St. Suite 1100 Chicago, IL 60602 312-368-0300 JOSEPH E. COHEN, Trustee

/s/ Joseph E. Cohen Attorney for Trustee